



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

EMERGENCY RESPONSE BRANCH

9311 GROH ROAD, ROOM 216

GROSSE ILE, MI 48138-1697

US EPA RECORDS CENTER REGION 5



598072

REPLY TO ATTENTION OF:

April 14, 1992

HSE-GI

Mr. Steve Nwabuzor
Engineering Services, Inc.
19135 Allen Road, Suite 101
Trenton, Michigan 48183

RE: Schreiber-Caravan Work Plan Comments

Dear Mr. Nwabuzor

The following are comments to the proposed Work Plan for the Schreiber-Caravan Drum Site located in Detroit, Michigan.

General Work Plan Comments

To date the U.S. EPA has not been informed as to who the contractor will be to conduct the actual site work. The Work Plan should state the scope of work for ESI and the scope of work for the contractor. Roles and responsibilities should also be outlined for all supervisory personnel (Project Manager, etc.).

Generally, the Work Plan lacked detail. It did not discuss in detail the characterization, sampling, excavation and disposal of contaminated soil. If it is necessary to have the data from soil sampling before a decision can be made as to either removal or remediation of the affected soil, then please state this. Discussion needs to be added on how samples will be collected, boring placement, and groundwater well placement and sampling.

There were no comments regarding sampling, characterization, or disposal of the tar boiler. This must be included in the Work Plan.

A statement must be included regarding the final report. The final report is to be submitted to the U.S. EPA within 30 days after completion of all site activities.

Table Of Contents

This section will need to reflect changes based on comments by the U.S. EPA on the Work Plan. Example: there is no section which deals with drum sampling QA/QC.

Section 1.0

What Phase will characterization of the tar boiler take place? Will the evaluation of the extent of soil contamination take place in Phase II?

Section 1.1, page 2

Please discuss briefly the types of contaminants present. This section should also discuss where the drums will be staged on site, if any secondary containment will be provided when staged, type of security and protection from the elements (if any), and that the drums themselves will be overpacked, not their contents. Signs must also be posted along the site perimeter to keep out unauthorized personnel.

Section 1.2, page 2

Analytical parameters should include volatile and semi-volatile organic compounds, not just BTEX.

This section should reference a drum handling and sampling standard operating procedures outlined in the site safety plan.

Will these drums be landfilled or incinerated? Mention that the drums will be disposed in a RCRA approved facility.

Section 1.3, page 3

Will any surface soil samples be collected? It may be more appropriate to take surface samples and after the analytical results have been reviewed determine where soil borings will be taken. A reference map is needed for this section. What about background soil samples/borings?

Section 1.3.1, page 3

No reference made to soil sampling SOP. How was it determined where the soil borings would be placed? There is no discussion on how the borings will be sampled and collected. Will split spoon or continuous cores be taken? What will they be collected in? Is a target chemical indicator list going to be developed from drum sampling and used to screen the soil samples? Will any air monitoring equipment be used for field screening these samples, and if so, what type(s)?

Please reference a map showing surface sample and soil boring locations.

Section 1.3.2, page 4

Please explain what other criteria will assist in determining well placement besides the two listed.

Please explain the reason galvanized well casing was chosen instead of other types.

Section 1.3.2, continued

Figure 3 was not included in the Work Plan. Please attach.

Section 1.3.3, page 5

Describe what is meant by well head survey and how groundwater levels will be measured in each well.

Section 2.1, page 6

The sample interval may be too great. This section could discuss surface soil sampling prior to soil borings being collected. Surface sampling may help in the placement and depth of soil borings to be collected.

Decontamination procedures for soil sampling equipment should be described, e.g. non-phosphate soap wash, tap water rinse, deionized water rinse, methanol rinse, rinse with tap water, air dry.

All cuttings and decontamination rinsate should be containerized, sampled and disposed of properly.

What is the fate of the samples that will not go to the lab? Will they remain on site or be placed with the soil cuttings?

Section 2.2, page 7

Does this section relate to Section 1.3.3? It may be best to combine both and discuss groundwater purging and sampling in the same section. Will temperature, conductivity, Ph, and turbidity be measured during well purging? These and other pertinent information should be kept in a sample logbook for each type of sampling event conducted at the site.

Section 2.3, page 7

Please include volatile and semi-volatile organic compound analysis for each sample. Are MDNR metals the same as priority pollutant metals? If not, include a list of the MDNR metals if these are different.

Please include the complete list of sample parameters and analytical methods, not just those for PNAs. A table would be useful for this.

Section 3.0, page 8

See General Work Plan comments regarding submission of this report. Please include all actual laboratory results as an attachment to the report.

Section 4.0

Please discuss in detail what the cleanup criteria will be (MCLs, background levels in the soil, etc).

Section 5.0

The Administrative Order specifies that work is to begin within 5 days after approval of the work plan. Please include a timeline detailing cleanup events for each phase.

Site Health and Safety Plan Comments

Section 1.0

Please fill in the blanks with the name of the contractor who will be conducting the actual site activities.

Section 2.11, page 4

Examples of physical hazards associated with manual labor and heavy equipment should also be listed.

The chemical hazards should include a table describing the types of chemicals present from previous sampling and analysis. This table should include what permissible exposure limits are, exposure routes and pathways, exposure symptoms, and first aid. This table is presented on page 8, and should be referenced.

Section 2.12, page 4

A standard SOP should be developed for each type of activity that is to take place at the site (i.e. drum handling/sampling, soil sampling, soil excavation, activities involving the tar boiler, etc.). Each SOP should also mention the use and type of personal protective clothing (PPE) that will be utilized for each activity.

Section 2.20, page 5

There is no mention of drum handling/sampling, or sampling of the tar boiler. Each hazard evaluation should be specific as to what the actual hazards are. We cannot assume everyone knows what the physical hazards are associated with heavy drilling, etc.

There is no discussion on what type of PPE will be worn.

Section 2.22, pages 5,6

When, and with what types of equipment will air monitoring be performed? Will the readings be recorded in a bound logbook?

Non-sparking tools will be utilized during soil sampling?

It is more appropriate to state that fire fighting equipment will be available in the exclusion zone. Please list the types of fire fighting equipment that will be available.

Again, no mention of PPE.

Section 2.30, page 6

There was no section discussing soil excavation and remediation in the Work Plan.

Please describe the physical hazards associated with excavation and use of heavy equipment. There needs to be specific mention of underground and overhead utility lines, personnel working around heavy equipment, etc.

Section 2.32, pages 6,7

Please describe the necessary safety features of heavy equipment such as backup alarms. Utility lines should be clearly marked and the local utility companies contacted (Miss Dig) before excavation or soil boring activities take place.

Excavation trenches should be shored as specified by OSHA. Reference the proper section of OSHA for this.

Again, greater detail is needed to discuss types and frequency of air monitoring.

Generally each activity should mention the level of personnel protection required. This may be presented in table form listing each type of activity, the level of protection, and any special requirements, i.e. face shields, leather gloves, etc.

Page 8, unidentified table

Please place a heading on this table and refer it throughout the HSP. The Immediately Dangerous to Life and Health (IDLH) standard for each contaminant should also be listed.

Section 3.11, page 9

Will Level B protection always be used, or is this based on air monitoring results?

Section 3.12, page 9

A description of the decontamination and transition zone is needed. A map should be presented and referenced. Will Level C protection be used throughout, or is this based on air monitoring results.

Section 3.13, page 9

What types of measures will be employed? Access should be restricted to authorized personnel only. Sign in/out logs should be used to track personnel on site.

Section 3.20, page 8

What about the tar boiler? Will personnel have to enter to conduct sampling, or remove the contents?

Section 3.30, page 10

No mention of hard hats.

Section 3.42, page 11

The action level for VOC contaminants seems high. Will 100 ppm result in cartridge breakthrough? A typical range is usually 5-50 ppm for Level C, and >50 ppm Level B.

Section 3.50, page 11

Since ESI is the prime contractor, decontamination procedures and delineation of zones is also their responsibility. A map showing the transition zone and decontamination zone must be presented. A decon pad or some other type of provision must be made to contain overspray and collect decontamination rinsate. The rinsate and cuttings must be containerized, sampled and properly disposed of.

Section 3.60, page 11

Daily site safety meetings should be recorded in a daily log which should be located on site during normal work periods.

Section 3.70, pages 12-14

Symptoms described for inhalation exposure are representative of what type of contaminant? The table presented earlier should be referenced here.

A map should be referenced which should the location of emergency support equipment such as an eye wash station, fire fighting equipment, emergency shower, etc.

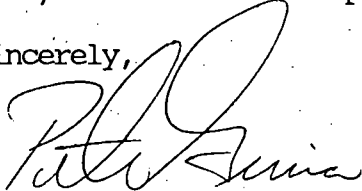
A section detailing evacuation routes and procedures must be added. What and who would determine when an evacuation is necessary? Where will be the location of the alternate command post? Who would decide when it is safe to re-enter the site? This section should include an emergency phone contact list with the local police, fire, EMS, hospital, and ESI emergency contact phone numbers. Notification of both the police and hospital would be advisable prior to the start of site activities.

Section 4.00, page 14

A Site Safety Plan signature page is needed for all personnel who will be working at the site to acknowledge that they have read and are to follow the procedures outlined in the HSP.

I have enclosed a copy of the Region V generic Workplan and Health and Safety Plan guidance to assist you in incorporating these comments. I would like to schedule a conference call to discuss these comments so that work may begin as soon as possible. Please contact me at (313) 692-7687 to set up a date and time at your earliest convenience.

Sincerely,

A handwritten signature in cursive script, appearing to read "Peter Guria".

Peter Guria
On-Scene Coordinator

cc: N.E. Zusman, ORC
M. Messersmith, EERB, ESS

bcc: File